

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA)

v.)

ROBERT SNYDER,)

Case No. 03:15-MJ- 320 (TWB)

Defendant.)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of from in or about November of 2010 through in or about October of 2014 in the county of Tompkins in the Northern District of New York and elsewhere the defendant violated:

Code Section

Attempted Receipt of Child
 Pornography, Title 18, United States
 Code, Section 2252A(a)(2) & (b)(1)

Offense Description

Defendant knowingly attempted to receive:
 (A) child pornography that had been mailed, and using any means and facility of interstate and foreign commerce, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; and
 (B) material that contained child pornography that had been mailed, and using any means and facility of interstate and foreign commerce, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

Possession and Accessing With Intent to
 View Child Pornography, Title 18,
 United States Code, Section
 2252A(a)(5)(B) & (b)(2)

Defendant knowingly possessed, and knowingly accessed with intent to view, computer disks and other material that contained an image of child pornography that had been mailed, and shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

This criminal complaint is based on these facts:
[SEE ATTACHED AFFIDAVIT]

☒ Continued on the attached sheet.

Attested to by the Applicant in Accordance with
the Requirements of Rule 4.1 of the Federal
Rules of Criminal Procedure.



Complainant's signature

Michael J Connelly, US Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: August 31, 2015


Judge's signature

City and State: Syracuse, New York

Hon. Thérèse Wiley Dancks, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT

I, Michael J Connelly, being duly sworn, depose and state as follows:

INTRODUCTION

1. I am an Inspector with the United States Postal Inspection Service (USPIS) assigned to the Boston Division, in Boston, MA, having been so employed since 2007. As a Postal Inspector, I am responsible for the investigation of federal criminal offenses involving the transportation, distribution, receipt, production, and sale of child pornography through United States mail in violation of Title 18, United States Code, §§ 2252 and 2252A. I have completed the USPIS Basic Inspector Training (BIT) program in Potomac, MD and I am an affiliate member of the Rhode Island and Massachusetts Internet Crimes Against Children (ICAC) Taskforces, routinely working with agents, troopers, and officers with dozens of years of experience investigating crimes involving the sexual exploitation of children. I have received training in the investigation of crimes involving the sexual exploitation of children by attending both seminars and courses. I have investigated child pornography cases and related sexual offenses on a full time basis since approximately May 2011.
2. As a federal agent, I am authorized to investigate violations of United States laws and to execute search and arrest warrants issued under the authority of the United States.
3. The statements contained within this affidavit are based upon my investigation, information provided by other law enforcement officers, and on my training and experience. As this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this

investigation. I have set forth only the facts that I believe necessary to establish probable cause to believe that ROBERT SNYDER has committed the crimes of attempting to receive child pornography in violation of 18 U.S.C §2252A(a)(2)(A), and possession and access with intent to view child pornography in violation of 18 U.S.C §2252A(a)(5)(B).

- a. Title 18 United States Code, Section 2252A(a)(2)(A), which makes it unlawful to knowingly distribute or receive child pornography using any means or facility of interstate or foreign commerce, shipped or transported in or affecting interstate or foreign commerce by any means including by computer; or attempting to do so.
- b. Title 18 United States Code, Section 2252A(a)(5)(B), which makes it unlawful to knowingly possess or access with intent to view, any material that contains an image of child pornography that has been mailed, or shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, or that was produced using materials that have been mailed, or shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

BACKGROUND OF THE INVESTIGATION

Sale of Child Pornography by the “Toronto Company”

4. In October of 2010, the United States Postal Inspection Service (“USPIS”) and the Toronto Police Service (“TPS”) began an investigation into a movie production company that operated a website offering DVDs and streaming videos (“films”) for sale. The majority of these films feature young boys and were marketed as “naturist films from around the world.” TPS and USPIS determined that this production company (the

"Toronto Company") was located in Toronto, Canada and was the subject of more than 20 complaints to the National Center for Missing and Exploited Children's Cyber TipLine regarding the sale of child pornography.

5. In October 2010, USPIS Inspectors accessed the Toronto Company's website and were able to review film previews, website movie summaries, and customer ordering information. On six occasions between February and April, 2011, USPIS Inspectors from Brentwood, Tennessee conducted controlled purchases of DVDs via the Toronto Company's online ordering system. By way of example, one of the videos purchased from the Toronto Company via an undercover purchase was titled "Cutting Room Floor – Vlaviu." The Toronto Company's website described this film as follows:

we sweep up the cutting room floor to bring you tow action-packed discs of ooey-goey slippery goodness with Vlaviu and his friends, Lore and Luci! Like our original . . . this is all the footage that didn't make the cut over the last 2-years from our Boy Fights series! This two disc set features Vlaviu and his buddies going commando in a very unique way. They're sweet enough, but that didn't stop them from breaking out the sugary cupcakes and giving you a whole new perspective on nudist food fighting! One this is for sure . . . there's no laundry to do tonight!¹

6. The video depicts minor boys seen naked in an apartment living room setting eating desserts and other food. There are several close-ups of the minors' genitals and pubic area as they eat desserts and towards the end of the film several of the boys are seen sitting naked on the desserts and placing the remnants in their anuses.
7. Law enforcement determined that the "Toronto Company" has a shipping facility located in North Tonawanda, New York and that the undercover online orders were transferred from the "Toronto Company," to this New York based shipping facility for fulfillment.

¹ The Toronto Company's website is quoted verbatim; misspellings are as in the original.

These undercover orders were then shipped from North Tonawanda, New York via USPS Priority Mail to a post office box in Nolensville, Tennessee.

8. TPS executed a search warrant on the Toronto Company's business premises on May 1, 2011 and seized hundreds of DVD movies, photo DVDs, computers, and business records, including customer shipping labels and customer order histories. Many of the DVD movies included the exhibition of the genitals of nude minors. Law enforcement determined that these films were being shipped to customers worldwide, including hundreds of individuals residing in the United States. Law enforcement also determined that for those orders placed from the United States, the Toronto Company would fill those orders via USPS Priority Mail.
9. The Toronto Company, as well as its two operating principals, were subsequently charged and are being prosecuted in Canada for child exploitation offenses, including the production and distribution of child pornography.

Child Pornography and "Website A"

10. Since at least in or about June 2012, USPIS as well as other United States and international law enforcement agencies, have been investigating an online website that has been used extensively by persons interested in exchanging images depicting child pornography to meet and become trading partners. This website is referred to as "Website A."
11. Below is a description of how Website A operated since at least in or about June 2012. Website A is a photo (still image) sharing website, hosted outside of the United States. Membership to Website A is free and includes unlimited hosting storage and free photo

sharing of digital images (not videos). Website A is organized by different forums according to topic. Examples include topics such as "architecture," "travel," "family," and "autos." Each Website A Forum contains albums posted and named by the registered Website A user that created the album.

12. To register an account, and thus become a "member" of Website A, a user must create a username and provide a valid email address in order to receive a password provided by Website A. Upon receiving this password, the user is prompted to create a new password which will be used to log in to Website A. Once this is done, the user, as a member, may create albums and post images within these albums. A user's albums are listed under his username. A member can create one or more photo albums and has the choice to make an album available to all individuals on the Web (a "public album") or make it a password protected album that is only accessible to individuals who know or have the password. When a member creates an album he may choose to have his contact email address displayed under his username (which appears at the top of the album) to others visiting his albums or instead ask others to "contact via comments." Even in instances where a member does not post his email address so other members can see it, it is not uncommon for the member to post the address in the comment section as a means of contact or when responding to a specific request from another member. An album consists of all of the pictures associated with that album, along with any posted comments. When a member creates an album he has a choice via a scroll down menu to allow: only Website A members who have created albums on Website A to add a comment, only Website A members to comment (regardless of whether these members have created their own albums on Website A), anyone accessing Website A (whether or

not they are a Website A member) to anonymously comment on the album, or to disable the comment feature. Anytime an individual posts a comment to an album, the owner of that album is automatically notified by Website A via the email he provided as his contact email address. The email message states that a comment was made, and includes the file name of the image commented on, the comment itself, the Website A user name of the person making the comment (if the person posting the comment is a Website A member) and a hyperlinked URL to the image with the corresponding comment. While the member who is the owner of an album cannot directly opt out of receiving these email notifications, if he were to go back into his membership profile and delete the email address he provided to Website A as his contact information he will not receive these automated email notifications.

13. Any individual on the Internet can view and post comments to non-password protected albums ("public albums") on Website A and download the images in those albums. Only members can create albums and upload pictures to albums. When a Website A member posts a comment to an album that member's username, country flag corresponding to the originating IP address, and the date and time of the comment are displayed next to the comment. When a comment is posted by a non-member of Website A, portions of the originating IP address and a country flag corresponding to that IP address are displayed next to that comment. Regardless of whether the individual posting a comment is a member or non-member, Website A logs the full originating IP address of the individual posting the comment.
14. Website A has become a popular means for individuals to trade child pornography images, in particular through the "nudity" and "kids" forums. Examples of the names of

albums within these two forums are "13 yo boy pics," "street boys," "Cute little brunette," "Baby and Toddler Boys," and "Maria chute chubby 16 yo (nude) (password protected)." Some Website A albums associated with some of the targets of these Operations are known to contain child pornography. In these cases, the child pornography is most likely to be in a password protected album, rather than in a public album. While most of the images law enforcement has seen posted in public albums may not constitute child pornography, often evidence from the images, and comments posted about the album (either by other individuals or the member who created the album), indicates that the particular poster or person who created the album has a sexual interest in children and that these individuals' interest in Website A lies in the ability to meet other individuals for the private trading of child pornography. A common scenario is for such a user to post child erotica or preview pictures of children, accompanied by a sexually suggestive title or comment, in a public album as a way to entice or attract other individuals with a sexual interest in children. The poster's purpose is often to solicit comments on the pictures posted from like-minded individuals. Once these individuals meet on Website A, they then agree to trade Website A passwords, or trade their private child pornography collections elsewhere, often by email, rather than risking trading child pornography on Website A itself. Individuals on the Internet, including Website A users, may regularly monitor public albums on Website A and post provocative comments or images in specific albums related to children with the hope of obtaining the password to other password protected albums or information on individuals that are willing to trade child pornography.

15. I have been informed that The High Technology Investigative Unit located within the U.S. Department of Justice's Child Exploitation and Obscenity Section has been involved in the investigation of more than two dozen Website A users who either posted sexually explicit images of children to Website A or distributed sexually explicit images of children to another user to obtain their password. In more than half of these cases, investigation revealed that these individuals were actively molesting children and in some instances posting images of that abuse to Website A.
16. In approximately April 2013, USPIS obtained a certain portion of Website A data, including information related to Website A usernames, album names, album passwords, user comments, and associated email addresses and IP logs associated with specific albums. This information was provided to USPIS by a foreign law enforcement agency which had received this data voluntarily from Website A in connection with a foreign law enforcement agency's investigation concerning certain users of Website A.

IDENTIFICATION OF ROBERT SNYDER

17. USPIS conducted a review of certain records contained in the "Toronto Company's" customer database and located one customer, Robert SNYDER, with addresses of 8 Parke Ave, Etna, NY 13062, PO Box 473, Etna, NY 13062, or a combination of the two, and determined that on multiple occasions, SNYDER purchased child pornography from this company's website. USPIS extracted the customer invoices and purchase summary from the database, which details the purchase transactions made by SNYDER. A summary review of the transactions showed that between November 2010 and February 2011, SNYDER purchased seven (7) titles via the "Toronto Company's" website, totaling

\$212.60 in United States currency. All transactions reviewed by USPIS employees related to this individual showed a billing and shipping address of 8 Parke Ave, Etna, NY 13062, PO Box 473, Etna, NY 13062, or a combination of the two, and a telephone number of 607-280-XXXX. The customer records related to this individual show that the purchaser used the following email as the confirmation email on the order: bobs28ford@hotmail.com. In addition to the contact information discussed above, the business records associated with each customer transaction also captured the date an order was placed and sometimes the IP address associated with the computer used to place the order. Each customer transaction also had a product identification number which corresponded to a specific video or DVD available for purchase.

18. Below is a summary of the relevant order information from one shipment:

ORDER NUMBER	95942
DATE	11/26/2010
TIME	21:52
NAME	Robert Snyder
BILLING DETAILS	8 Parke Ave. PO Box 473 Etna, NY 13062
PHONE	607-280-XXXX
EMAIL	<u>bobs28ford@hotmail.com</u>
AUTH CODE	Capture Card
Product ID	70197
Product Name	FKK Indian Ranch (2009) DVD
Grand Total Price	\$46.27

19. The following is a description of the movie file “**FKK Indian Ranch**,” which is available for the Court’s review upon request:

70197.avi

This movie file depicts two minor males under the age of 18 who are naked in a bathroom. The two children get into the bathtub and play with snorkels and goggles. At several points the camera zooms in focusing on their penises and

testicles. Then the scene changes to an outdoor area, around which a series of wooden and plastic tarp walls have been constructed which are approximately 20 feet high. Five minor male children strip off their clothes and proceed to build teepees. The children then take turns tying one child to a pole and drawing on his naked body with crayons. The others then dance around the boy who is tied up, drawing on him and tickling him. The children then jump into a pool and wash off the crayon and then sit on the ground with their legs spread apart, talking to the individual who is holding the camera. The entire movie file is shot from a point of view style and at no points are adults visible on camera. At multiple points the child's genitals are lasciviously displayed. (1:57:10)

20. Below is a summary of the relevant order information from another shipment:

ORDER NUMBER	104896
DATE	2/22/2011
TIME	18:51
NAME	Robert C. Snyder ²
BILLING DETAILS	8 Parke Ave. PO Box 473 Etna, NY 13062
PHONE	607-280-XXXX
EMAIL	<u>bobs28ford@hotmail.com</u>
IP ADDRESS	67.249.203.133
AUTH CODE	Capture Card
Product ID	70249
Product Name	Cutting Room Floor: Vlaviu [2-disc] (2011) DVD
Grand Total Price	\$25.70

21. The following is a description of the movie file "**Cutting Room Floor: Vlaviu**," which is available for the Court's review upon request:

70249-1.avi

This movie file depicts three minor males under the age of 18 who enter what appears to be an apartment kitchen carrying food. All three children are nude and eat seated on the floor. One of the children sits on a cupcake, causing pieces of it to become stuck to his buttocks and genital area. This same process is repeated over and over with the same male child sitting on numerous cupcakes which have been placed on a basketball, a bicycle seat, and on a mattress until he is covered in chocolate with numerous lascivious displays of the child's genitals. One of the boys in the above mentioned scene enters the camera view in a kitchen, removes all of his clothes, and sits down on a basketball, exposing his genitals. He then

² The name is spelled as it was found on the Toronto Company's order information; it is believed that the user made a typo and intended to type Robert Snyder.

proceeds to eat what appears to be chicken and repeatedly sits on pieces of meat on top of the basketball. At multiple points the child's genitals are lasciviously displayed. (1:30:16)

70249-2.avi

This movie file depicts one of the three minor males seen in *70249-1.avi* who enters what appears to be the same kitchen and removes all of his clothes. The child then places pieces of meat and more chocolate cupcakes on the basketball before sitting on them, forcing pieces of food to become stuck to his buttocks and anus. At multiple points the child's genitals are lasciviously displayed. (1:06:48)

VERIFICATION OF SNYDER's IDENTITY

22. As discussed above, child pornography was delivered to the PO Box 473, Etna, NY 13062 on multiple occasions between November, 2010 and February, 2011. Thereafter, on or about June 30, 2011, the United States Department of Justice Criminal Division, Child Exploitation and Obscenity Section, (CEOS,) issued an administrative subpoena to Time Warner Cable LLC., for IP address **67.249.203.133** on February 22, 2011 at 18:51 EST which was the information from the customer database related to the order of "Cutting Room Floor: Vlaviu" title mentioned in the paragraphs above. On or about July 25, 2011, Time Warner Cable provided the following relevant information for the assignment of that IP address on the date and time in question:

Name:	Robert Snyder
Address:	8 Parke Ave., Etna, NY 13062
Phone:	(607) 280-XXXX
User Name:	RSNYDER004@txcny.rr.com
Method of Payment:	Cash
Length of Service:	7/31/2007 – Present

23. On or about October 3, 2013, CEOS issued an administrative subpoena to Hotmail/Microsoft Online Services, for email address bobs28ford@hotmail.com which is information from the customer database related to SNYDER's transactions with the "Toronto Company," and which was seen as a registered user of Website A. On or about

October 16, 2013, Microsoft provided the following relevant information pertaining to that account:

Login:	<u>bobs28ford@hotmail.com</u>
First Name:	robert
Last Name:	snyder
State:	New York
Zip:	13026

Additionally, Microsoft provided a log of the IP addresses which the email account was accessed from, including that on 10/15/2013 at 1:29:39 PM PST the account was accessed from IP address **24.59.14.154**.

24. On or about December 30, 2013, CEOS issued an administrative subpoena to Time Warner Cable LLC., for the assignment of IP address **24.59.14.154** on 10/15/2013 at 1:29:39 PST. On or about February 10, 2014, Time Warner provided the following relevant information:

Subscriber Name:	Robert Snyder
Subscriber Address:	8 Parke Ave., Etna, NY 13062
Activation Date:	7/31/2007
Deactivation Date:	Active
User Name:	<u>RSNYDER004@txcny.rr.com</u>
Phone:	(607) 280-XXXX

25. A check with the New York Department of Motor Vehicles (DMV) on or about April 8, 2014 revealed that an individual named Robert C Snyder with a date of birth of XX/XX/1948 resides at the 8 Parke Ave, Etna, NY 13062 and is assigned a DMV client ID of XXXXX6722.

26. A check of United States Postal Service, (USPS) records indicate that in 2007, an individual rented PO Box 473 and provided the following information on the application for Post Office Box service:

Name: Snyder, Robert C
Type of Box: Residential/Personal Use
Physical Address: 8 Parke Ave, Etna, NY 13062
Telephone Number: 607-280-XXXX

When the PO Box application was accepted, the individual who opened the box provided a NY Driver's license (XXXXXX6722) and a vehicle registration card as identification to the USPS employee processing the application.

27. A check of USPS records as of April 7, 2014 indicates that SNYDER was still receiving mail at PO Box 473, Etna, NY 13062. Additionally, USPS records confirmed that the physical address of 8 Parke Ave, Etna, NY 13062 is located in a mobile home or trailer park and that there is no residential mail delivery in the park. Customers are required to pay for a PO Box in order for them to receive mail. The Post Office in Etna, NY is approximately 0.4 miles from SNYDER's residence.
28. Based upon my knowledge, experience, and training in child pornography investigations, and the training and experience of other law enforcement officers with whom I have had discussions, I know that individuals who use PO Boxes to receive mail, packages, and other correspondence tend to take the mail which they receive and then bring it into their place of residence. This happens in the same fashion as it would in the case of an individual receiving mail by means of a mailbox on a post at the roadside, who then collects their mail and subsequently brings it into their residence.
29. A search of publicly and privately available search tools was conducted for Robert SNYDER with a date of birth of XX/XX/1948. These public records indicate that SNYDER's current mailing address is PO Box 473, Etna, NY 13062 and also lists 8 Parke Ave, Etna, NY 13062 as another address associated with SNYDER.

30. Based on my review of the order information related to SNYDER, as well as my review of the videos purchased by SNYDER, there is probable cause to believe that SNYDER purchased child pornography via the Toronto Company's website and that SNYDER received or attempted to receive this child pornography by means of his USPS PO Box noted above.

INTERVIEW OF ROBERT SNYDER

31. On October 27, 2014, USPIS investigators went to SNYDER's Etna, New York residence to speak with him. SNYDER was home at the time, and when investigators knocked at SNYDER's door, SNYDER invited investigators inside.
32. SNYDER waived his *Miranda* rights and agreed to speak with USPIS investigators without an attorney present.³ SNYDER admitted that he had accessed the "Toronto Company's" website and that he had purchased several DVDs through that website on multiple occasions using his credit card. He further admitted that he has accessed Website A on multiple occasions, including password protected albums posted by other users, from a computer in his residence, as recently as two or three weeks prior to the interview. When asked to describe the images that he had viewed on Website A, SNYDER stated that he had viewed images of minor male children, approximately 12 to 14 years old, and that the children were nude in these images. During the interview SNYDER also admitted that he had seen images of children engaged in sexual acts with each other or with adults but said that it was many years ago, saying that he preferred to view images of nude pre-pubescent male children rather than children engaged in more 'hard core' sexual acts. When asked how long he has been interested in images of nude

³ An audio copy of the entire interview is available for the court's review upon request.

children, SNYDER said he has looked for images like that for his whole life and that he was sexually attracted to women as well as boys between 12 and 14 years old. SNYDER also provided written consent to search his residence, as well as any electronic storage media therein.

33. During the consensual search of SNYDER's residence, investigators discovered numerous recordable CDs/DVDs and previewed several of the disks. Investigators observed the contents of the disks and noted that many contained short video clips of nude minor male children as well as images which appeared to have been clipped or edited from other video files. SNYDER was asked about the videos files and where they had come from, to which he responded that he had software on his computer which would allow a video to be edited and a specific portion copied to a separate disk. SNYDER stated that he had specifically chosen the images and videos because the children were nude and so that he could easily have access to the portions of the videos he wanted to see. SNYDER also admitted to taking photos and videos during overseas trips to various locations including Saudi Arabia, Bangladesh, and other locations. SNYDER also admitted to scanning older photographs to convert them to digital files.

34. One of the disks previewed with SNYDER's consent was a silver recordable CD found in an orange CD case. The words "My Photo Bangladesh" were written on the CD in black marker. Snyder was asked about the disk and was shown the images which were found on the CD, to which he stated that some of the images had been taken from a video he had made while traveling in Bangladesh in the 1990s. When shown an image entitled Untitled-16.jpg, SNYDER stated that he had used his computer to convert the video file he had into separate image files. The disk contained 24 sequentially named pictures,

(Untitled-16.jpg through Untitled-39.jpg,) of a minor male child approximately 10-13 years of age, standing on a dock next to the water. The only identifiable contents of these 24 sequential photographs are of a naked minor child depicted from his waist down to his feet.⁴

Untitled-39.jpg

The image appears to be taken from a video file in which a single frame was deliberately isolated and saved as a .jpg image. The image depicts a minor male child approximately 10 – 13 years old on the left side of the frame standing naked on a dock near the water. The child is visible from mid sternum to his feet with his legs slightly apart lasciviously displaying his genitals.

SNYDER was asked again if he had made the photographs intentionally, to which he responded that he had done so to deliberately capture images of a naked prepubescent child.

FORENSIC ANALYSIS OF SNYDER's COMPUTERS AND DIGITAL MEDIA

35. On December 11, 2014, USPIS Inspectors applied for and were granted a warrant to search the computers and associated digital media seized during the search of Snyder's residence, [03:14-MJ-459 (TWD)]. The search warrant was executed and the computers and digital storage devices were forwarded to the USPIS Forensic Laboratory, Digital Evidence Unit (DEU) for analysis.
36. One item analyzed by DEU was an HP P2-1310 Desktop Computer (S/N: 3CR2510D70), which was recovered from the office located in Snyder's residence. The computer contained a Western Digital 500 GB hard drive and appears to have been the primary computer in use at the time of the interview of Snyder.

⁴ Copies of the images are available for the court's review.

37. Your affiant reviewed the forensic analysis of the device and identified approximately 17 images of minor children, (primarily prepubescent males) engaged in sexually explicit conduct, including lascivious exhibition of the children's genitals, as well as masturbation, digital penetration, genital-genital, oral-genital, and genital-anal sexual intercourse. These images were located in unallocated space on the computer and it appears that the original files were deleted or only temporarily viewed by the user but the files had not been overwritten by new data yet, thereby allowing them to be recovered.

38. One of the images recovered from the HP P2-1310 Desktop computer is the following:

File MD5 Hash: *8fc1626eacec8c565515b57b785c13fe*

File Description: *This image file depicts a minor male child between approximately 12 and 15 years of age who is seen lying on top of another male of an unknown age. Both the child and the other male are naked and the second male's penis is inserted in the anus of the child who is lying on top of him.*

39. The forensic tools employed in the search also recovered numerous other categories of relevant information including an email address of bobs28ford@hotmail.com which was accessed from the computer and user names typed into an Internet web browser including Snyder, bobs28ford, and bobs28ford@hotmail.com. The computer also contained records of downloads with file names associated with the "Toronto Company" as well as forensic artifacts indicating multiple visits to Website A. It is also of note that other email addresses or different usernames were not observed by your affiant which indicates that Snyder was the only individual to use this computer on a regular basis.

40. Also recovered were numerous search terms which the user had typed into various Internet browsers or search engines. The following are a representative sample of these search terms:

Boy genitalia
Skinny dipping kids
Dead boy
[Website A] Boy
Child genitalia check
Young male genitalia check
Naked boy hospital
Nude boy injured
Boy Boner
Boy balls
Boy jacking
Injured genital boys
Flaccid child

41. A second item analyzed by DEU was an HP Pavilion p6000 Desktop Computer (S/N: MXX0380ZPB). The computer contained a Western Digital 750 GB hard drive and appeared to have been a previously used computer as it was unplugged and on the floor of the living room at the time of its recovery at Snyder's residence.
42. Your affiant reviewed the forensic analysis of this device and identified approximately 200 images of minor children, (primarily prepubescent males), some as young as 3 months, engaged in sexually explicit conduct, specifically the lascivious exhibition of the children's genitals. In addition, your affiant located approximately 9 images of minor children engaged in sexually explicit conduct, specifically masturbation, urination, oral-genital, and genital-anal sexual intercourse. These images were located in unallocated space on the computer and it appears that the original files were deleted or only temporarily viewed by the user but the files had not been overwritten by new data yet, thereby allowing them to be recovered.
43. One of the images recovered from the HP Pavilion p6000 Desktop is the following:

File MD5 Hash: 7adc8acd1f20e699fcc2ee6d7b6c6f07

File Description: This image file depicts two minor male children between approximately 12 and 15 years of age, one of whom is lying on a bed while the second minor male child kneels over the face of the first child. The first child is performing oral sex on the second child.

44. Forensic tools also recovered Internet artifacts similar to those found in the previously mentioned computer including numerous records of accessing the bobs28ford@hotmail.com email address as well as dozens of Internet search terms. The following are a representative sample of these search terms:

*Boo [Website A]
"Toronto Company" online
Boy pee, this month
Circumcision
Boy wanking
Boy nude
Boy naked
Boy shower
Coming of age deleted scenes
Bo Circumcision this month
Tortured boy
Shower boy
Boy naked swim
Boy pee
12 year old wrestling
Boy nut grabbing
Circumcised boy
Circumcised boy photo
Boy balls*

45. Based on the preceding information I have probable cause to believe that on multiple occasions Robert SNYDER did possess and access with the intent to view child pornography in violation 18 U.S.C §2252A(a)(5)(B).

FURTHER INFORMATION

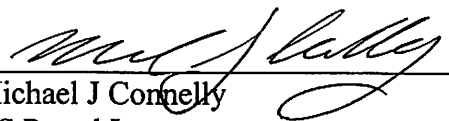
46. A check of open source information from the Internet regarding SNYDER revealed that an individual by the name of Robert C Snyder of Etna, NY held two certificates from the

New York State Education Department, Office of Teaching Initiatives. One was issued 9/1/1986 and expired 8/31/1991 and was described as Nursery, Kindergarten, and Grades 1-6 CQ. The second was issued 9/1/1987 and expired 8/31/1992 and was described as Nursery, Kindergarten, and Grades 1-6 Provisional Certificate. Your affiant was informed by a postal clerk at the Etna, NY post office that SNYDER routinely receives mail addressed to him from a number of different local school districts.

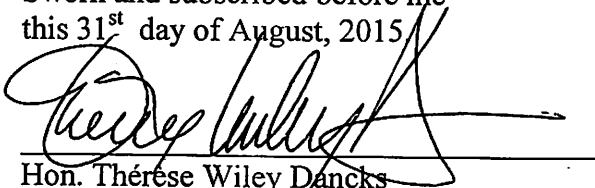
47. During the October 27, 2014 interview, SNYDER stated that he is currently employed as a substitute teacher in the towns of Dryden, South Seneca, Newfield, Ithaca, and Lansing, New York and that he has worked full time in that capacity for the last 16 years.

CONCLUSION

48. Based upon the above information, there is probable cause to believe that ROBERT SNYDER has committed the crimes of attempting to receive child pornography in violation of 18 U.S.C §2252A(a)(2)(A), and possession and access with intent to view child pornography in violation of 18 U.S.C §2252A(a)(5)(B). Accordingly, I respectfully request that this Court issue a criminal complaint and arrest warrant for the person of Robert Snyder.


Michael J Connelly
US Postal Inspector

Sworn and subscribed before me
this 31st day of August, 2015


Hon. Therese Wiley Dancks
U.S. Magistrate Judge
N.D.N.Y.